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July 14, 2023

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. ("SEA"), in the above-referenced matter. As per Your Honor's direction in the Order of May 26, 2023, we are providing a joint status report.

As relayed in May, the parties have now entered the final stage of the Settlement Agreement reached with the assistance of the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.). A settlement outreach has been launched to customers who were identified through a deliberate process as potentially part of Plaintiffs' putative class and individual offers of settlement have been made. Responses have already been received, but we are awaiting additional responses. We therefore respectfully request that Your Honor allow us to report back in September 2023.

Respectfully,

/s/ James J. O'Hara

JAMES J. OHARA

On behalf of Defendant,
Samsung Electronics America, Inc.

Respectfully,

/s/ Jonathan Shub

On behalf of Plaintiffs

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)